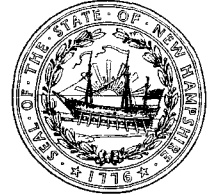




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

January 19, 2006

Mr. Mel Seng
Vice President of Operations
Norcross Safety Products, LLC
1136 Second Street
Rock Island, Illinois 61201

**CERTIFIED MAIL (7099 3400 0018 1290 6573)
RETURN-RECEIPT REQUESTED**

**NOTICE OF PAST VIOLATION
(Sta.S)**

**RE: Norcross Safety Products, LLC
103 Temple Street, Nashua, New Hampshire**

Dear Mr. Seng:

On August 31, 2005, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at Norcross Safety Products, LLC, ("Norcross") at 103 Temple Street, Nashua, New Hampshire. The purpose of the inspection was to determine Norcross' compliance status with the N.H. Administrative Rules Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution. The purpose of this letter is to notify you of the violations discovered during the inspection. The specific violations are as follows:

1. Env-A 608.01 requires the owner of a stationary source, area source, or device with total actual volatile organic compound ("VOC") emissions greater than or equal to 10 tons per year to obtain a state permit to operate. As a result of the inspection and information submitted on February 28, 2005 by Norcross to DES in an annual emissions report for 2004, DES has determined that Norcross exceeded the 10-ton VOC threshold in calendar year 1999 and every year thereafter. DES received a permit application from Norcross on July 12, 2005.
2. Env-A 603.01 states that no person shall cause or allow the construction or installation of a new or modified stationary source, area source, or device as specified in Env-A 607.01, which is required to hold a temporary permit in accordance with the provisions of this chapter, without having applied for and been issued a temporary permit. Norcross installed a new slush molding machine and spray booth in calendar year 2003 without first applying for a temporary permit.
3. Env-A 907.01 requires the owner or operator of any stationary source, area source or device subject to Env-A 600 to submit an annual emissions report that includes the actual annual emissions speciated by individual regulated air pollutants, including a breakdown of VOC emissions by compound. Beginning with calendar year 1999, the annual emissions report was required to be submitted to DES on or before April 15 of the following year. At the time of the inspection, Norcross had not submitted any emission reports for calendar years 1999 through 2003. DES received the emissions report for calendar year 2004 on February 28, 2005. DES received the emissions reports for calendar years 1999 through 2003 on December 5, 2005.

4. Env-A 705.01 requires the owner or operator of any stationary source, area source or device which is required to have a Temporary Permit, State Permit to Operate or Title V Operating Permit to annually pay emission-based fees for all permitted devices. At the time of the inspection, Norcross had not paid emission fees for calendar years 1999 through 2003. In accordance with Env-A 705.04, fees for calendar year 2004 were due by July 15, 2005. DES received the emissions fees for calendar year 2004 on September 6, 2005. DES received the emissions fees for calendar years 1999 through 2003 on December 5, 2005.

DES recognizes the efforts that Norcross has taken to come into compliance. Accordingly, no further action in response to the listed violations is required.

DES requests that Norcross comply with the NH Rules Governing the Control of Air Pollution and all obligations contained in any permit to be issued to Norcross in the future. Also, please be advised that the emissions report and payment for calendar year 2005 emissions are due by April 15, 2006. In the event that other violations are identified or if Norcross fails to comply with all applicable requirements in the future, DES may take action against Norcross, including issuing an administrative order, seeking administrative fines, and/or referring the matter to the NH Department of Justice for civil and/or criminal penalties.

If you believe that DES has cited these violations in error, or have questions regarding these matters, please contact Barbara Hoffman at (603) 271-7874, Air Resources Division, Compliance Bureau. A current copy of the Air Resource Division rules can be obtained from the DES website at <http://www.des.nh.gov/rules/air.htm> or by contacting the DES Public Information Center at (603) 271-2975.

Sincerely,



Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

PGM/asb

cc: R. Kurowski, EPA Region I
G. Hamel, DES Legal Unit Administrator
Bernard A. Streeter, Mayor, City of Nashua
Prakash Devasthali, Technical Director, Norcross Safety Products, LLC
Richard Langin, Plant Manager, Norcross Safety Products, LLC
AFS # 3301191098